

# **Exhibit A**

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**From:** mail@levygrandinetti.com via Uniregistry Support System  
<regtransfer@uniregistry.com>  
**Sent:** Friday, July 22, 2016 7:54 PM  
**To:** associatedrec@gmail.com  
**Cc:** Maddox, Claire M.; Wu, Eric Y.  
**Subject:** IMPROPER TRANSFER - [RAR-transfer #110513] Domains Received COT 1:15-cv-01723-AJT-JFA, Associated Recovery, LLC v. John Does 1-44  
**Attachments:** Dkt 59 - Order granting motion to set aside default judgment.pdf

This message is related to ticket [Uniregistry #110513].

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Dear Ms. Judy S:

Thank you for speaking with me regarding the transfer or sale by Uniregistry of the domain names OCU.com, YTE.com, and JTZ.com.

We represent Associated Recovery in an in rem action against 44 domain names, including these three domain names.

The previous holders or "transferees" of these three domain names are located in China.

Our firm served these transferees and/or the known holders of these domain names by e-mail, air mail, and publication. The transferees and/or the known holders of these domain names chose not to respond. We then submitted the evidence of service to the U.S. District Court for the Eastern District of Virginia (ED of Va), which is the Court having jurisdiction and venue over VeriSign.

The Court granted Associated Recovery default judgments against these three domain names and eleven other domain names, which are identified in the Default Judgment Order that was previously sent to you by Associated Recovery.

VeriSign transferred the "defaulted" domain names to Associated Recovery. Then, a few of the Chinese crept out of the woodwork and asked the ED of Va Court to "set aside" the default.

The ED Va Court set aside the default for these Chinese persons/entities and permitted them to become "Defendants" in an in personam civil action in the U.S. District Court for the Northern District of Texas.

These Chinese persons/entities NEVER ASKED the ED of Va Court to reclaim possession or have the domain names returned to them. The ED of Va Court NEVER ORDERED THE RETURN of the domain names.

The Order setting aside the default judgment is attached. The Order setting aside the default judgment merely permits these Chinese persons/entities to be DEFENDANTS in the ND of Texas civil action.

At this time, the Chinese persons/entities for these three domain names HAVE NOT APPEARED in the ND of Texas Court.

Please return the three domain names to Associated Recovery. Please do not transfer any of the domain names identified in the Default Judgment Order until we have an opportunity to obtain the necessary Court action or provide the evidence that your legal department desires.

Further, your company's imposing a "registrar lock" on the rest of the domain names registered to Associated Recovery is a violation of ICANN policy and my client's rights. There is nothing in the Court order, granting the default judgment, that permits you to "lock" Associated Recovery's domain names. We demand that your company immediately remove this lock on their names.

Please contact this firm regarding this matter. Also, if your legal staff requires anything more, please have them join in the call. We will endeavor to obtain the paperwork or other evidence necessary to satisfy your legal staff.

A copy of your e-mail to Associated Recovery is below for your reference and convenience.

Thank you,

Paul Grandinetti

Levy & Grandinetti

Suite 304

1120 Connecticut Ave., N.W.

Washington, D.C. 20036

(202) 429-4560<<tel:%28202%29%20429-4560>>

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This message is related to ticket [Uniregistry #110513].

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Hello,

We have received notice of further litigation in relation to OCU.com and YTE.com. These names, in addition to JTZ.com, will remain locked against transfer to another registrant pending the further litigation. The remaining names in this group of names are transferable among registrants, but will remain locked at the registrar pending expiration of 60 days from their transfer to us.

Please be advised should further notice of pending litigation be received for any additional names, the lock against transfer of registration will be implemented for those names.

Thank you.

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Judy S

Uniregistry Compliance

+1 949-276-3456<<tel:%2B1%20949-276-3456>>

[regtransfer@uniregistry.com](mailto:regtransfer@uniregistry.com)<<mailto:regtransfer@uniregistry.com>>